

ORDER :

*Motion granted
Defendant Campbell's*

*Supplemental expert
written report shall be
served within 21 days
after completion of subject
Rule 30(b)(6) deposition.*

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

AMERICAN NATIONAL PROPERTY)
AND CASUALTY COMPANY)

Plaintiff,)

v.)

CAMPBELL INSURANCE, INC.,)
TOMMY L. CAMPBELL, and)
MARSHA COLLEEN CAMPBELL,)
and A 2 Z INSURANCE, INC.)
LIBERTY MUTUAL INS. CO., and)
MONTGOMERY MUTUAL INS.CO.)

Defendants.)

Case No.: 3:08-CV-00604

Judge Robert L. Echols
Magistrate Judge John S. Bryant

JURY DEMAND

*John Bryant,
USMJ*

**MOTION FOR EXTENSION OF DEADLINE FOR SERVICE
OF EXPERT REPORT FOR TOMMY CAMPBELL**

Defendant, Tommy L. Campbell, respectfully moves the Court for an extension of the deadline by which his expert witness must provide the information specified in F.R.C.P. 26(a)(2). As grounds for this motion, the Defendant states his expert will need additional information to complete his report. The information needed was to be subject of the Rule 30(b)(6) deposition of ANPAC, a deposition which has been repeatedly postponed at the instance of the Plaintiff.

Mr. Tommy Campbell has served a written report prepared by his expert witnesses, Brookshire Barrett & Associates, LLC. The report is an analysis of the present value of lost pension benefits (post-termination compensation). Mr. Tommy Campbell has filed a counterclaim for those benefits which are provided for by the Post-Termination Compensation Schedule attached to the Agent Agreement.

The written report of Mr. Campbell's experts states, in part,